

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appellants:	Paramjit Kahlon, Nardo B. Catahan, Jr., Shailendra Garg, Maria Theresa Barnes-Leon, Ramaswamy Sundararajan		
Assignee:	Siebel Systems, Inc.		
Title:	INVENTORY BALANCE COMMON OBJECT		
Application No.:	10/696,097	Filing Date:	October 28, 2003
Examiner:	Fahd A. Obeid	Group Art Unit:	3627
Docket No.:	OIC0099US	Confirmation No.:	6621

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Austin, Texas  
**June 25, 2012**

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**APPEAL BRIEF**

Dear Sir:

This brief is submitted in support of the Notice of Appeal filed on April 23, 2012 by the Appellants to the Board of Patent Appeals and Interferences from the Examiner's final rejection of claims 1-22 and 34-37. The appellant notes that the appeal filed April 23, 2012 was received by the USPTO, thereby giving the appellant a period for filing set to expire on Monday, June 25, 2012 since the due date of June 23, 2012 falls on a Saturday.

Please charge deposit account No. 502306 for the fee associated with this Appeal Brief. Please charge this deposit account for any additional sums which may be required to be paid as part of this appeal.

REAL PARTY IN INTEREST

The real party in interest on this appeal is Oracle Corporation. On January 31, 2006, Siebel Systems, Inc., the assignee of record, was acquired by Oracle Corporation.

RELATED APPEALS AND INTERFERENCES

There are no appeals or interferences related to this application.

STATUS OF CLAIMS

Claims 1-22 and 34-37 are pending in the application.

Claims 23-33 were previously cancelled.

Claims 1-22 and 34-37 stand rejected in the Final Office Action dated December 22, 2011 (“FOA”) and in the Advisory Action dated April 4, 2012 (“AA”).

Appellants appeal the final rejection of claims 1-22 and 34-37.

STATUS OF AMENDMENTS

Appellants submitted amendments on November 2, 2011, subsequent to the final rejection of December 22, 2011. As indicated in the Advisory Action, these amendments were not entered.

SUMMARY OF CLAIMED SUBJECT MATTER

The following summary of the claims is presented in accordance with 37 C.F.R. § 41.37(c)(v).

Appellants' independent claim 1 is directed to a computer-implemented method for managing inventory. *See, e.g.*, paragraph [0014] and [0015], Figures 1 and 3. The method synchronizes inventory balance information between a source computerized inventory management system and a target computerized inventory management system. *See, e.g.*, paragraph [0018], Figure 1. The source computerized inventory management system and the target computerized inventory management system are among a plurality of computerized inventory management systems. *See, e.g.*, paragraph [0018], Figure 1. The synchronizing is bi-directional and it is performed by an integration server. *See, e.g.*, paragraph [0018], Figure 1.

The synchronizing extracts inventory balance information in a source format. *See, e.g.*, paragraph [0020] and [0027]. The source format is a format used by the source computerized inventory management system. *See, e.g.*, paragraph [0020] and [0027]. The inventory balance information in the source format is associated with the source computerized inventory management system. *See, e.g.*, paragraph [0020] and [0027].

The synchronizing converts the inventory balance information in the source format into source inventory balance information in an intermediate format. *See, e.g.*, paragraph [0020] and [0027].

The synchronizing receives target inventory balance information. *See, e.g.*, paragraph [0020] and [0027]. The target inventory balance information is associated with the target computerized inventory management system. *See, e.g.*, paragraph [0013]-[0015].

The synchronizing converts the target inventory balance information into target inventory balance information in the intermediate format. *See, e.g.*, paragraph [0027], [0035], and [0036], Figures 3A and 3B.

The synchronizing generates an inventory balance delta. *See, e.g.*, paragraph [0022] and [0023]. The inventory balance delta is calculated as a difference between a

source inventory balance and a target inventory balance. *See, e.g.*, paragraph [0022] and [0023]. The source inventory balance information in the intermediate format includes the source inventory balance. *See, e.g.*, paragraph [0027] and [0030]. The target inventory balance information in the intermediate format includes the target inventory balance. *See, e.g.*, paragraph [0027] and [0030]. The generating is performed by the integration server. *See, e.g.*, paragraph [0030]-[0032] and [0035], Figure 1.

The synchronizing converts the inventory balance delta into inventory balance information in a target format. *See, e.g.*, paragraph [0027], [0035], and [0036], Figures 3A and 3B. The target format is a format used by the target computerized inventory management system. *See, e.g.*, paragraph [0013]-[0015]. The inventory balance information in the target format comprises the inventory balance delta. *See, e.g.*, paragraph [0022] and [0023]. The inventory balance information in the target format is associated with the target computerized inventory management system. *See, e.g.*, paragraph [0013]-[0015].

Appellants' independent claim 12 is directed to a computer-readable storage medium carrying one or more sequences of instructions for managing inventory. *See, e.g.*, paragraph [0014], [0015], and [0032], Figures 1 and 2. The one or more sequences of instructions are executed by one or more processors to synchronize inventory balance information between a source computerized inventory management system and a target computerized inventory management system. *See, e.g.*, paragraph [0014], [0015], and [0032], Figures 1 and 2. The source computerized inventory management system and the target computerized inventory management system are among a plurality of computerized inventory management systems. *See, e.g.*, paragraph [0018], Figure 1. The synchronizing is bi-directional and it is performed by an integration server. *See, e.g.*, paragraph [0018], Figure 1.

The synchronizing extracts inventory balance information in a source format. *See, e.g.*, paragraph [0020] and [0027]. The source format is a format used by the source computerized inventory management system. *See, e.g.*, paragraph [0020] and [0027]. The inventory balance information in the source format is associated with the source computerized inventory management system. *See, e.g.*, paragraph [0020] and [0027].

The synchronizing converts the inventory balance information in the source format into source inventory balance information in an intermediate format. *See, e.g.*, paragraph [0020] and [0027].

The synchronizing receives target inventory balance information. *See, e.g.*, paragraph [0020] and [0027]. The target inventory balance information is associated with the target computerized inventory management system. *See, e.g.*, paragraph [0013]-[0015].

The synchronizing converts the target inventory balance information into target inventory balance information in the intermediate format. *See, e.g.*, paragraph [0027], [0035], and [0036], Figures 3A and 3B.

The synchronizing generates an inventory balance delta. *See, e.g.*, paragraph [0022] and [0023]. The inventory balance delta is calculated as a difference between a source inventory balance and a target inventory balance. *See, e.g.*, paragraph [0022] and [0023]. The source inventory balance information in the intermediate format includes the

source inventory balance. *See, e.g.*, paragraph [0027] and [0030]. The target inventory balance information in the intermediate format includes the target inventory balance. *See, e.g.*, paragraph [0027] and [0030]. The generating is performed by the integration server. *See, e.g.*, paragraph [0030]-[0032] and [0035], Figure 1.

The synchronizing converts the inventory balance delta into inventory balance information in a target format. *See, e.g.*, paragraph [0027], [0035], and [0036], Figures 3A and 3B. The target format is a format used by the target computerized inventory management system. *See, e.g.*, paragraph [0013]-[0015]. The inventory balance information in the target format comprises the inventory balance delta. *See, e.g.*, paragraph [0022] and [0023]. The inventory balance information in the target format is associated with the target computerized inventory management system. *See, e.g.*, paragraph [0013]-[0015].

GROUND OF REJECTION TO BE REVIEWED ON APPEAL

The rejection of claims 1-4, 12-15, and 33-37 under 35 U.S.C. § 103(a) as purportedly being unpatentable over Coleman, U.S. Patent No. 5,708,828 (Coleman) in view of Balgeman, U.S. Patent No. 5,446,880 (Balgeman) and further in view of King, U.S. Patent Publication No. 2003/0110104 (King) is to be reviewed on appeal.

The rejection of claims 5-11 and 16-22 under 35 U.S.C. § 103(a) as purportedly being unpatentable over Coleman, Balgeman, and in further view of Katz, U.S. Patent Publication No. 2002/0178077 (Katz) is to be reviewed on appeal.

ARGUMENT

I. THE REJECTION OF CLAIMS 1-4, 12-15, AND 34-37 UNDER 35 U.S.C. § 103(A) AS BEING UNPATENTABLE OVER COLEMAN IN VIEW OF BALGEMAN AND IN FURTHER VIEW OF KING SHOULD BE OVERTURNED

Claims 1-4, 12-15, and 33-37 are pending in the application and stand rejected under 35 U.S.C § 103(a) as being unpatentable over Coleman in view of Balgeman and in further view of King. While not conceding that the cited references qualify as prior art, but instead to expedite prosecution, Appellants have chosen to respectfully disagree and demonstrate that the rejections of the Final Office Action dated December 22, 2011 (“FOA”) are in clear error because the cited passages of Coleman, Balgeman, and King, as well as Coleman, Balgeman, and King generally, whether taken alone or in any permissible combination, fail to disclose, teach, or even suggest the limitations of the independent claims.

A. Claims 1, 2, 12, 13, and 33

Independent claims 1 and 12 each have elements substantially similar to the following form:

“...  
generating an inventory balance delta, wherein  
    the inventory balance delta is calculated as a difference between a  
        source inventory balance and a target inventory balance,  
    the source inventory balance information in the intermediate  
        format comprises the source inventory balance,  
    the target inventory balance information in the intermediate format  
        comprises the target inventory balance, and  
    the generating is performed by the integration server, and  
...”

Coleman relates to a data conversion system which converts data between different software and hardware platforms. *Coleman*, Abstract. Coleman, in general terms, discusses aspects related to a data conversion language/engine (DCLE), which converts data from different types of data to a data standard having a pre-defined generic data type, and then converts from this generic data type to a new desired data type and stores the result on a destination platform. *Coleman*, 2:44-54. However, insofar as



Appellants are able to discern, Coleman does not teach or suggest generating an inventory balance delta (i.e., the difference between a source inventory balance and a target inventory balance). Further, the FOA (correctly) fails to cite any passages of Coleman against any elements of claim 1 related to generating an inventory balance delta. Appellants therefore respectfully submit that Coleman fails to teach or suggest at least these features of claim 1, among others.

Balgeman does not remedy the deficiencies of Coleman. Balgeman, in general terms, discusses aspects of a database interface that provides a translation from a record format of a given database to a standardized format for transmission to other nodes, thus providing translation between different databases formats. *Balgeman*, Abstract. In Balgeman, subsequent updates of a record are automatically distributed to the other nodes by utilizing a standardized record format. *Balgeman*, 8:51-60. However, insofar as Appellants are able to discern, Balgeman fails to show, teach or suggest any concept even remotely comparable to the claimed generating of an inventory balance delta. Further, the FOA (correctly) also does not cite Balgeman for any elements of claim 1 related to generating an inventory balance delta. Appellants therefore respectfully submit that Balgeman, taken alone or in any rational combination with Coleman (which also fails to teach these features), also fails to show, teach, or suggest at least these features of claim 1, among others.

King also fails to remedy these deficiencies. King, in general terms, relates to an inventory management system associated with providing components and materials to customers. *King*, Abstract. King discusses monitoring and managing value-added services, (e.g., assembly and aggregating services that can be performed on components), and disseminating information directed to inventory management. *Id.* King also discusses sharing information related to customer demands, inventory levels, advance shipping notices, work in process, delivery, and replenishment. *Id.*

On page 5, the FOA cites various portions of King, but fails to particularly point out what elements of King might somehow be mapped to the elements of claim 1 related to generating an inventory balance delta. Furthermore, on page 7, the AA cites the same portions of King, only adding the following as an alleged justification for these incorrect mappings – “King teaches a server which calculates a source inventory data such as forecasted demands and also calculates target inventory data such as in-transit/shipped

orders to obtain an inventory balance data such as the actual on-hand demand.” However, these alleged mappings are clearly in error, as argued below.

The cited paragraph [0040] of King relates to FIG. 3 that discusses elements that are generated, received and/or transmitted by and between parties of FIG. 3. The cited paragraph [0043] of King relates to FIG. 5 that shows elements that are created, received and/or transmitted by a supply chain server, logistics provider, and supplier. The cited paragraph [0080] of King relates to calculation of a demand plan. Appellants respectfully submit that King does not teach or suggest any of the above recited elements of claim 1.

If one were to attempt to map, as suggested by the FOA on page 7, the element of forecasted demands of King to the source inventory data of claim 1, such a mapping would fail for at least the following reasons. Forecasted demands (element 24 of FIG. 4) refers to the customer forecasted demands 24 that are generated by customers 2. *See, e.g., King*, [0040]. The forecasted demands 24 identify components that customers will expect to require over a period of time. *Id.* Appellants respectfully submit that the forecasted demands of King cannot be mapped to source inventory data of claim 1, at least for the simple reason that the forecasted demand merely corresponds to some customer-generated request and not to inventory balance information in a source format. Furthermore, even if the forecasted demands of King were somehow combined with Coleman, the resulting combination (even if somehow possible, a point with which Appellants do not acquiesce) would still fail, at least because the data conversion engine of Coleman (that converts data from a first format to a second format) (*see Coleman* at the cited portion at 1:9-13) could, at best, receive a customer-generated request in a first format, but would still not correspond to the claimed inventory balance information in a source format.

Furthermore, if one were to attempt to map, as suggested by the FOA on page 7, the element of in-transit/shipped orders of King to the target inventory data of claim 1, such a mapping would fail for at least the following reasons. In-transit/shipped orders (element 12 of FIG.2) refer to VMI Inventory that is being transported to a service provider / customer / other party. *See, e.g., King*, [0037]. Appellants respectfully submit that the in-transit/shipped orders of King cannot be mapped to target inventory data of claim 1, at least for the simple reason that the in-transit/shipped orders merely correspond to portions of VMI inventory that are being shipped to a customer, and do not reflect

inventory balance information (in a target format or otherwise). Moreover, even if the in-transit/shipped orders of King were somehow combined with Coleman, the resulting combination (even if somehow possible, a point with which Appellants do not acquiesce) would still fail, at least because the data conversion engine of Coleman (that converts data from a first format second formats) (*see Coleman* at the cited portion at 1:9-13) could, at best, generate a portion of VMI inventory (that is being shipped) in a second format, but would still not correspond to the claimed inventory balance information in a target format.

The above notwithstanding, if one were to attempt to map the element of “actual on-hand demand,” or even “on-hand demand” of King (as suggested by the FOA on page 7) to the inventory balance delta of claim 1, such a mapping would fail at least because King does not teach or suggest any such element. For example, Appellants respectfully submit that the cited portions of King, or even King in general, do not discuss any “on-hand demand” elements. Appellants respectfully submit that the King reference discusses various other elements with the word “demand” and “on-hand,” but such elements will be addressed in the discussions below.

Furthermore, Appellants respectfully submit that King has no need for using multiple formats. As such, adding any conversions between multiple formats to King does not make sense, since any operations of King, such as shown in FIG. 4, are performed on elements (such as customer requests and demand plans) that are in the same format. *See, e.g., King* at [0040]. As such, because there is no need in King for using multiple formats, there is no way to successfully draw a parallel between any given data source and a particular format. Thus, in addition to the obvious lack of motivation, Applicants also respectfully note the impossibility of properly combining the systems of Coleman and King as a result of the inability to definitively map any of Coleman’s formats to any of King’s orders (or other elements, for that matter).

The above also notwithstanding, if one were to attempt to map the element of on-hand inventory (which includes the terms “actual” and “on-hand”) of King to the inventory balance delta of claim 1, such a mapping would fail for at least the following reasons. The on-hand inventory (element 28 of FIG. 5) of King is merely provided as part of a demand plan (element 26 of King). *See, e.g., King* at [0040] and [0045]. However, this on-hand inventory cannot possibly be mapped to the inventory balance

delta of claim 1, at least because the on-hand inventory reflects existing inventory levels, and not the claimed difference between a source inventory balance and a target inventory balance.

Alternatively, if one were to attempt to map King's replenishment demand plan to the inventory balance delta of claim 1, such a mapping would fail for at least the following reasons. The replenishment demand plan (element 32 of FIG. 4) is used when generating replenishment orders that are transmitted to a supplier. *King*, [0049]. For example, a supplier can use the replenishment plan to fulfill customer demands, refill VMI inventory levels, or generate shipping notice information. *Id.* In other words, the replenishment demand plan is used for replenishment of VMI inventory (element 12), such as by estimating an amount of inventory that will be placed in a VMI hub after customer's forecasted demand (element 24) is met. *King*, [0056]. Appellants respectfully submit that it is clear the replenishment demand plan of King cannot be mapped to an inventory balance delta, at least for the simple reason that the replenishment demand plan is an estimate of customer demands, and is not calculated in any manner, much less as the claimed difference between a source inventory balance and a target inventory balance.

Further still, if one were to attempt to map King's demand plan to the inventory balance delta of claim 1, such a mapping would fail for at least the following reasons. The demand plan (element 26 of FIG. 4) is generated from forecasted demands and the inventory data, such as on-hand, WIP, and in transit inventory. Even in a light most favorable to the position taken in the FOA, King simply relates to the determination of a demand plan based on forecasted demands from customers. *See, e.g., King at* [0043]. However, determining a demand plan is not the same as generating an inventory balance delta, at least for the simple reason that such a demand plan does not reflect any sort of relationship between any values, much less any values comparable to the claimed source inventory balance and target inventory balances (even assuming, for the sake of argument, that elements analogous thereto were to exist in King). Therefore, Appellants respectfully submit that it is clear that the demand plan of King cannot be mapped to an inventory balance delta, at least for the simple reason that the demand plan is determined using received forecasted demands from customers, and is not calculated as a claimed difference between a source inventory balance and a target inventory balance. *King*, [0043].

Still further, if one were to attempt to map the element of inventory balance of King to the inventory balance delta of claim 1, such a mapping would fail for at least the following reasons. Inventory balance (element 28 of FIG. 4) refers to the VMI inventory balance. *See, e.g., King*, [0059]. The VMI inventory balance references VMI inventory (Vendor Managed Inventory) of a VMI hub, such as hub (element 11). *See, e.g., King*, [0032]. Each such VMI hub stores Vendor Managed Inventory (element 12) received from company warehouses. *King*, [0032]. Appellants respectfully submit that it is clear that the VMI inventory balance of King cannot be mapped to an inventory balance delta, at least for the simple reason that the VMI inventory merely corresponds to some inventory at a VMI hub, and is not calculated, and certainly not calculated as a claimed difference between a source inventory balance and a target inventory balance. *King*, [0032].

Such shortcomings are to be expected, given that King is concerned with creating and fulfilling demand plans to replenish inventory based on customer demands, forecasted customer demands, and/or value added services. King does not teach or suggest generating an inventory balance delta, where the inventory balance delta is calculated as a difference between a source inventory balance and a target inventory balance. Thus, King, taken alone or in any rational combination with Balgeman and Coleman (which also fail to teach these features, as noted earlier), also fails to show, teach, or suggest at least these features of claim 1, among others.

In summary, since the combination of Coleman, Balgeman, and King does not teach or suggest each and every feature of claim 1, the combination of Coleman, Balgeman, and King cannot render claim 1 obvious. Furthermore, independent claim 12 is patentable over Coleman, Balgeman, and King for similar reasons to independent claim 1, and further in view of its own features. Claims 2, 13, and 33 are patentable over Coleman, Balgeman, and King for at least the reasons provided for their respective base independent claims, and further in view of their own features. Accordingly, Appellants respectfully request that the rejection of claims 1, 2, 12, 13, and 33 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

B. Claims 3 and 14

Dependent claims 3 and 14 each have elements substantially similar to the following form:

“...  
using the inventory balance information in the target format to update an existing  
inventory balance record in the target computerized inventory  
management system  
...”

Coleman relates to a data conversion system which converts data between different software and hardware platforms. *Coleman*, Abstract. Coleman, in general terms, discusses aspects related to a data conversion language/engine (DCLE), which converts data from different types of data to a data standard having a pre-defined generic data type, and then converts from this generic data type to a new desired data type and stores the result on a destination platform. *Coleman*, 2:44-54. However, insofar as Appellants are able to discern, Coleman does not teach or suggest updating existing inventory balance information using the inventory balance information in the target format. Further, the FOA (correctly) fails to cite any passages of Coleman against any elements of claim 3 related to updating existing inventory balance information using the inventory balance information in the target format. Appellants therefore respectfully submit that Coleman fails to teach or suggest at least these features of claim 3, among others.

Balgeman does not remedy the deficiencies of Coleman. Balgeman, in general terms, discusses aspects of a database interface that provides a translation from a record format of a given database to a standardized format for transmission to other nodes, thus providing translation between different databases formats. *Balgeman*, Abstract. In Balgeman, subsequent updates of a record are automatically distributed to the other nodes by utilizing a standardized record format. *Balgeman*, 8:51-60. However, insofar as Appellants are able to discern, Balgeman fails to show, teach, or suggest any concept even remotely comparable to the claimed updating existing inventory balance information using the inventory balance information in the target format.

Appellants respectfully submit that Balgeman merely discusses “transmitting a copy of an updated first record based on the original record from said second database to

the first database containing the corresponding original record.” In other words, Balgeman discusses transmitting a copy of an updated record (e.g., to update another database), and is completely silent on any concept even remotely comparable to the claimed updating existing inventory balance information using inventory balance information in a target format. This is to be expected, since Balgeman is not directed to using any element comparable to inventory balance information, much less updating existing inventory balance information using such inventory balance information (in a target format or otherwise). Appellants therefore respectfully submit that Balgeman, taken alone or in any rational combination with Coleman (which also fails to teach these features), also fails to show, teach, or suggest at least these features of claim 3, among others.

King also fails to remedy these deficiencies. Insofar as Appellants are able to discern, King does not teach or suggest updating existing inventory balance information using the inventory balance information in the target format. Further, the FOA (correctly) fails to cite any passages of King against any elements of claim 3 related to updating existing inventory balance information using the inventory balance information in the target format. Appellants therefore respectfully submit that King fails to teach or suggest at least these features of claim 3, among others. Thus, King, taken alone or in any rational combination with Balgeman and Coleman (which also fail to teach these features, as noted earlier), also fails to show, teach, or suggest at least these features of claim 3, among others. Furthermore, claim 14 is patentable over Coleman, Balgeman, and King for similar reasons to claim 3, and further in view of its own features.

#### C. Claims 4 and 15

Dependent claims 4 and 15 each have elements substantially similar to the following form:

“...  
updating existing inventory balance information using the inventory balance  
information in the target format, wherein  
the existing inventory balance information is in the target format,  
the existing inventory balance information is associated with the target  
computerized inventory management system, and  
the updating is based, at least in part, on the inventory balance delta.  
...”

Coleman relates to a data conversion system which converts data between different software and hardware platforms. *Coleman*, Abstract. Coleman, in general terms, discusses aspects related to a data conversion language/engine (DCLE), which converts data from different types of data to a data standard having a pre-defined generic data type, and then converts from this generic data type to a new desired data type and stores the result on a destination platform. *Coleman*, 2:44-54. However, insofar as Appellants are able to discern, Coleman does not teach or suggest updating existing inventory balance information using the inventory balance information in the target format. Further, the FOA (correctly) fails to cite any passages of Coleman against any elements of claim 4 related to updating existing inventory balance information using the inventory balance information in the target format, much less updating any such existing inventory balance information based on the inventory balance delta. Appellants therefore respectfully submit that Coleman fails to teach or suggest at least these features of claim 4, among others.

Balgeman does not remedy the deficiencies of Coleman. Balgeman, in general terms, discusses aspects of a database interface that provides a translation from a record format of a given database to a standardized format for transmission to other nodes, thus providing translation between different databases formats. *Balgeman*, Abstract. In Balgeman, subsequent updates of a record are automatically distributed to the other nodes by utilizing a standardized record format. *Balgeman*, 8:51-60. However, insofar as Appellants are able to discern, Balgeman fails to show, teach or suggest any concept even remotely comparable to the claimed updating existing inventory balance information using the inventory balance information in the target format. Further, the FOA (correctly) fails to cite any passages of Balgeman against any such elements of claim 4.

Appellants also respectfully note that Balgeman discusses only “transmitting a copy of an updated first record based on the original record from said second database to the first database containing the corresponding original record.” In other words, Balgeman discusses transmitting a copy of an updated record (e.g., to update another database), and is completely silent on any concept even remotely comparable to the claimed updating existing inventory balance information using inventory balance information in a target format. This is to be expected, since Balgeman is not directed to using any element comparable to inventory balance information, much less updating



existing inventory balance information using such inventory balance information (in a target format or otherwise). Appellants therefore respectfully submit that Balgeman, taken alone or in any rational combination with Coleman (which also fails to teach these features), also fails to show, teach, or suggest at least these features of claim 4, among others.

King also fails to remedy these deficiencies. On pages 5 and 7, the FOA cites various portions of King as allegedly relating to generating an inventory balance delta. Appellants disagree with these allegations, and respectfully submit that King fails to show, teach, or suggest the claimed updating existing inventory balance information using inventory balance information in a target format. Instead, King is concerned with creating and fulfilling demand plans to replenish inventory based on customer demands, forecasted customer demands, and/or value added services. In other words, at no point does King teach or even suggest operations in any way comparable to the claimed updating existing inventory balance information using inventory balance information in a target format. This is not surprising, since King simply relates to generating demand plans from customer estimates, and not with updating inventory balance information using inventory balance information, in a target format or otherwise.

Thus, King, taken alone or in any rational combination with Balgeman and Coleman (which also fail to teach these features, as noted earlier), also fails to show, teach, or suggest at least these features of claim 4, among others. Furthermore, claim 15 is patentable over Coleman, Balgeman, and King for similar reasons to claim 4, and further in view of its own features.

D. Claim 34

Dependent claim 34 recites, *inter alia*, the following:

“...  
the generating the inventory balance delta further comprises calculating a second  
difference between a second source inventory balance and the difference  
between the source inventory balance and the target inventory balance,  
wherein  
the second source inventory balance information in the  
intermediate format comprises the second source inventory  
balance.  
...”

Coleman relates to a data conversion system which converts data between different software and hardware platforms. *Coleman*, Abstract. However, insofar as Appellants are able to discern, Coleman does not teach or suggest updating calculating a second difference between a second source inventory balance and the difference between the source inventory balance and the target inventory balance. Further, the FOA (correctly) fails to cite any passages of Coleman against any elements of claim 34 related to these limitations. Appellants therefore respectfully submit that Coleman fails to teach or suggest at least these features of claim 34, among others.

Balgeman does not remedy the deficiencies of Coleman. Balgeman, in general terms, discusses aspects of a database interface that provides a translation from a record format of a given database to a standardized format for transmission to other nodes, thus providing translation between different databases formats. *Balgeman*, Abstract. However, insofar as Appellants are able to discern, Balgeman fails to show, teach or suggest any concept even remotely comparable to these limitations. Further, the FOA (correctly) fails to cite any passages of Balgeman against any such elements of claim 34.

King also fails to remedy these deficiencies. On pages 5 and 7, the FOA cites various portions of King as allegedly relating to generating an inventory balance delta. As argued above with relation to claim 1, Appellants disagree with these allegations, and respectfully submit that King also does not teach or suggest such updating existing inventory balance information using the inventory balance information in the target format. Instead, King is concerned with creating and fulfilling demand plans to replenish inventory based on customer demands, forecasted customer demands, and/or value added services.

Appellants respectfully submit that King merely discusses performing inventory calculations based on forecasted demands from customers. In other words, at no point does King teach or even suggest updating existing inventory balance information using the inventory balance information in the target format, much less calculating a second difference between a second source inventory balance and the difference between the source inventory balance and the target inventory balance. Thus, King, taken alone or in any rational combination with Balgeman and Coleman (which also fail to teach these features, as noted earlier), also fails to show, teach, or suggest at least these features of claim 34, among others.

II. THE REJECTION OF CLAIMS 5-11 AND 16-22 UNDER 35 U.S.C. § 103(A) AS BEING UNPATENTABLE OVER COLEMAN IN VIEW OF BALGEMAN IN VIEW OF KING AND IN FURTHER VIEW OF KATZ SHOULD BE OVERTURNED

Claims 5-11 and 16-22 are pending in the application and stand rejected under 35 U.S.C § 103(a) as being unpatentable over Coleman in view of Balgeman in view of King and in further view of Katz. While not conceding that the cited references qualify as prior art, but instead to expedite prosecution, Appellants have chosen to respectfully disagree and demonstrate that the rejections of the Final Office Action dated December 22, 2011 (“FOA”) are in clear error because the cited passages of Coleman, Balgeman, King, and Katz, as well as Coleman, Balgeman, King, and Katz, generally, whether taken alone or in any permissible combination, fail to disclose, teach, or even suggest the limitations of the independent claims.

A. Claims 5-11 and 16-22

Claims 5-11 and 16-22 are rejected under U.S.C. § 103(a) as being unpatentable over Coleman in view of Balgeman, King, and further in view of Katz. Appellants respectfully traverse this rejection.

As demonstrated earlier, independent claims 1 and 12 are patentable over Coleman, Balgeman, and King. Upon review of Katz, Appellants can discern no showing, teaching, or even suggestion that Katz in any way remedies the deficiencies of Coleman, Balgeman, and King, and therefore claims 1 and 12 are also patentable over Coleman, Balgeman, King, and Katz, alone or in combination. Appellants further assert that claims 5-11, which depend from claim 1, and claims 16-22, which depend from claim 12, are also patentable over Coleman, Balgeman, King, and Katz for at least the reasons provided for their respective base claims, and further in view of their own features. Accordingly, Appellants respectfully request that the rejection of claims 5-11 and 16-22 be reconsidered and withdrawn.

CONCLUSION

For the above reasons, Appellant respectfully submits that the rejection of pending Claims 1-22 and 34-37 is unfounded. Accordingly, Appellant respectfully requests that the Board reverse the rejections of these claims.

Respectfully submitted,

/ Samuel G. Campbell III /

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CLAIM APPENDIX

1. (Previously Presented) A computer-implemented method for managing inventory, the method comprising:  
synchronizing inventory balance information between a source computerized inventory management system and a target computerized inventory management system, wherein  
the source computerized inventory management system and the target computerized inventory management system are among a plurality of computerized inventory management systems,  
the synchronizing is bi-directional, wherein  
the synchronizing is performed by an integration server, and  
the synchronizing comprises  
extracting inventory balance information in a source format, wherein  
the source format is a format used by the source computerized inventory management system, and  
the inventory balance information in the source format is associated with the source computerized inventory management system,  
converting the inventory balance information in the source format into source inventory balance information in an intermediate format,  
receiving target inventory balance information, wherein  
the target inventory balance information is associated with the target computerized inventory management system,  
converting the target inventory balance information into target inventory balance information in the intermediate format,  
generating an inventory balance delta, wherein  
the inventory balance delta is calculated as a difference between a source inventory balance and a target inventory balance,  
the source inventory balance information in the intermediate format comprises the source inventory balance,

the target inventory balance information in the intermediate format comprises the target inventory balance, and the generating is performed by the integration server, and converting the inventory balance delta into inventory balance information in a target format, wherein the target format is a format used by the target computerized inventory management system, the inventory balance information in the target format comprises the inventory balance delta, and the inventory balance information in the target format is associated with the target computerized inventory management system.

2. (Previously Presented) The computer-implemented method of Claim 1, wherein the receiving the target inventory balance information is performed in response to querying the target computerized inventory management system by the integration server.
3. (Previously Presented) The computer-implemented method of Claim 1, further comprising:  
extracting inventory balance information in a second source format that is associated with a second source computerized inventory management system that is distinct from the first source computerized inventory management system, wherein the second source computerized inventory management system is one of the plurality of computerized inventory management systems;  
converting the inventory balance information in the second source format into inventory balance information that is in the intermediate format;  
converting the inventory balance information in the intermediate format into inventory balance information in the target format; and  
using the inventory balance information in the target format to update an existing inventory balance record in the target computerized inventory management system.

4. (Previously Presented) The computer-implemented method of Claim 1, further comprising:  
updating existing inventory balance information using the inventory balance information in the target format, wherein  
the existing inventory balance information is in the target format,  
the existing inventory balance information is associated with the target computerized inventory management system, and  
the updating is based, at least in part, on the inventory balance delta.
5. (Previously Presented) The computer-implemented method of Claim 1, wherein the intermediate format comprises a hierarchy of data elements comprising a plurality of inventory balance elements comprising:  
a list of inventory balances element;  
an inventory balance related inventory location element;  
a list of related inventory balances for defining a plurality of related inventory balances; and  
a custom data element for defining customized attributes for the inventory.
6. (Previously Presented) The computer-implemented method of Claim 5, wherein each of the plurality of inventory balance elements comprises a related inventory location element for defining related inventory location identifier.
7. (Previously Presented) The computer-implemented method of Claim 5, wherein each of the plurality of inventory balance elements comprises a list of inventory balance data element for defining a plurality of inventory balance data elements.
8. (Previously Presented) The computer-implemented method of Claim 5, wherein each of the plurality of inventory balance elements comprises an inventory balance custom data.
9. (Previously Presented) The computer-implemented method of Claim 7, wherein each of the plurality of inventory balance data elements comprises a related product element for defining a product identifier.

10. (Previously Presented) The computer-implemented method of Claim 7, wherein each of the plurality of inventory balance data element comprises a list of balance data element for defining a plurality of balance data elements.

11. (Previously Presented) The computer-implemented method of Claim 10, wherein each of the plurality of balance data elements comprises:

- a bucket code element;
- a quantity of product element;
- a product unit of measure code element; and
- a balance data custom data element.

12. (Previously Presented) A computer-readable storage medium carrying one or more sequences of instructions for managing inventory, wherein execution of the one or more sequences of instructions by one or more processors causes the one or more processors to perform:

synchronizing inventory balance information between a source computerized inventory management system and a target computerized inventory management system, wherein

the source computerized inventory management system and the target computerized inventory management system are among a plurality of computerized inventory management systems,

the synchronizing is bi-directional, wherein

the synchronizing is performed by an integration server, and

the synchronizing comprises

extracting inventory balance information in a source format, wherein

the source format is a format used by the source computerized inventory management system, and

the inventory balance information in the source format is

associated with the source computerized inventory management system,

converting the inventory balance information in the source format into

source inventory balance information in an intermediate format,



receiving inventory balance information, wherein  
the target inventory balance information is associated with the  
target computerized inventory management system,  
converting the target inventory balance information into target inventory  
balance information in the intermediate format,  
generating an inventory balance delta, wherein  
the inventory balance delta is calculated as a difference between a  
source inventory balance and a target inventory balance,  
the source inventory balance information in the intermediate  
format comprises the source inventory balance,  
the target inventory balance information in the intermediate format  
comprises the target inventory balance, and  
the generating is performed by the integration server, and  
converting the inventory balance delta into inventory balance information  
in a target format, wherein  
the target format is a format used by the target computerized  
inventory management system,  
the inventory balance information in the target format comprises  
the inventory balance delta, and  
the inventory balance information in the target format is associated  
with the target computerized inventory management  
system.

13. (Previously Presented) The computer-readable storage medium of Claim 12,  
wherein  
the receiving inventory balance information is performed in response to querying  
the target computerized inventory management system by the integration server.

14. (Previously Presented) The computer-readable storage medium of Claim 12, further comprising:  
extracting inventory balance information in a second source format that is associated with  
a second source computerized inventory management system that is distinct from  
the first source computerized inventory management system, wherein  
the second source computerized inventory management system is one of the  
plurality of computerized inventory management systems;  
converting the inventory balance information in the second source format into inventory  
balance information that is in the intermediate format;  
converting the inventory balance information in the intermediate format into inventory  
balance information in the target format; and  
using the inventory balance information in the target format to update an existing  
inventory balance record in the target computerized inventory management  
system.
15. (Previously Presented) The computer-readable storage medium of Claim 12, further comprising:  
updating existing inventory balance information using the inventory balance information  
in the target format, wherein  
the existing inventory balance information is in the target format,  
the existing inventory balance information is associated with the target  
computerized inventory management system, and  
the updating is based, at least in part, on the inventory balance delta.

16. (Previously Presented) The computer-readable storage medium of Claim 12, wherein the intermediate format comprises a hierarchy of data elements comprising a plurality of inventory balance elements comprising:
- a list of inventory balances element;
  - an inventory balance related inventory location element;
  - a list of related inventory balances for defining a plurality of related inventory balances; and
  - a custom data element for defining customized attributes for the inventory.
17. (Previously Presented) The computer-readable storage medium of Claim 16, wherein each of the plurality of inventory balance elements comprises a related inventory location element for defining related inventory location identifier.
18. (Previously Presented) The computer-readable storage medium of Claim 16, wherein each of the plurality of inventory balance elements comprises a list of inventory balance data element for defining a plurality of inventory balance data elements.
19. (Previously Presented) The computer-readable storage medium of Claim 16, wherein each of the plurality of inventory balance elements comprises an inventory balance custom data.
20. (Previously Presented) The computer-readable storage medium of Claim 18, wherein each of the plurality of inventory balance data elements comprises a related product element for defining a product identifier.
21. (Previously Presented) The computer-readable storage medium of Claim 18, wherein each of the plurality of inventory balance data elements comprises a list of balance data element for defining a plurality of balance data.

22. (Previously Presented) The computer-readable storage medium of Claim 21, wherein each of the plurality of balance data elements comprises:

- a bucket code element;
- a quantity of product element;
- a product unit of measure code element; and
- a balance data custom data element.

23-33. (Canceled)

34. (Previously Presented) The computer-implemented method of Claim 1, further comprising:

receiving second target inventory balance information, wherein

- the second inventory balance information is associated with a second source computerized inventory management system,

converting the second inventory balance information into second source inventory balance information in the intermediate format, and

the generating the inventory balance delta further comprises calculating a second difference between a second source inventory balance and the difference between the source inventory balance and the target inventory balance, wherein

- the second source inventory balance information in the intermediate format comprises the second source inventory balance.

35. (Previously Presented) The computer-implemented method of Claim 1, wherein the source inventory balance information comprises the source inventory balance for a plurality of products;  
the target inventory balance information comprises the target inventory balance for the plurality of products; and  
the inventory balance delta comprises a plurality of differences between the source inventory balance and the target inventory balance, wherein each of the plurality of differences indicates a difference between the source inventory balance for one of the plurality of products and a corresponding target inventory balance for the one of the plurality of products.
36. (Previously Presented) The computer-implemented method of Claim 35, wherein the converting the inventory balance delta into inventory balance information in the target format comprises:  
converting the inventory balance delta into a plurality of inventory balance information in the target format, wherein  
each of the plurality of inventory balance information in the target format is associated with a different one of the plurality of products.
37. (Previously Presented) The computer-implemented method of Claim 1, wherein the source inventory balance information further comprises a respective source inventory balance at each location of a plurality of locations.

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EVIDENCE APPENDIX

None

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RELATED PROCEEDINGS APPENDIX

None